

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Michael Kates	:	Chapter 13
Debtor	:	Case No. 16-15025

Michael Kates	:
Movant/Debtor	:

v.	:
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Nationstar Mortgage LLC	:
Respondent	:

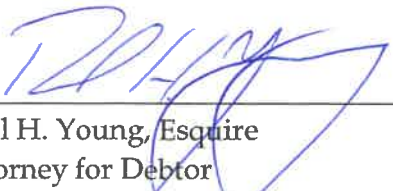
STIPULATION IN SETTLEMENT OF MOTION TO TURNOVER PROPERTY

Michael Kates ("Movant" and/or "Debtor") and Nationstar Mortgage, LLC ("Respondents"), by and through their respective counsel, hereby stipulate and agree as follows:

1. Debtor filed this Chapter 13 case on July 15, 2016.
2. Debtor was advised that Respondent is holding a surplus of funds paid on the account in escrow.
3. Debtor has filed a Motion to Turnover Property, requesting an Order be entered directing Respondent to release the escrow surplus funds to Debtor.
4. Debtor desires to use a portion of the funds held by Respondent to satisfy the balance of his Chapter 13 Plan.
5. The parties have agreed to the following to resolve the Motion to Turnover Property:
 - a. Respondent is directed to release all surplus escrow funds to Debtor directly.

- b. Debtor is directed to pay \$3,114.30 to Scott Waterman, Trustee, to satisfy the balance of Debtor's confirmed Chapter 13 Plan.
- c. Debtor is allowed to keep the remainder of any escrow surplus released to Debtor by Respondent.
- d. If the Debtor fails to remit payment to the Chapter 13 Trustee as required by paragraph 5(b) within 10 days of receipt of payment, Respondent may certify Default of this Stipulation with the court and obtain immediate Relief from the Automatic Stay to reinstate foreclosure proceedings.

STIPULATED AND AGREED TO BY:



Paul H. Young, Esquire
Attorney for Debtor
Young, Marr, Mallis & Deane
3554 Hulmeville Road, Suite 102
Bensalem PA 19020
215-639-5297

6/8/21

Date

/s/ Kristen D. Little

Kristen D. Little, Esquire
Attorney for Respondent
LOGS Legal Group
3600 Horizon Drive, Suite 150
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610-278-6800

May 18, 2021

Date

Scott Waterman, Trustee

Date